

**UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,

Plaintiff,

v.

COMMONWEALTH OF PUERTO RICO, et al.,

Defendants.

**SEALED**

No. 12-CV-2039 (GAG)

**JOINT MOTION FOR EXTENSION OF TIME TO REQUEST FURTHER COURT  
DIRECTIVES**

Plaintiff, United States of America, and Defendants, Commonwealth of Puerto Rico, et al. (collectively, the “Parties”), respectfully seek an extension of time until February 5, 2016 to file any requests for additional directives to the Technical Compliance Advisor (“TCA”).

On December 10, 2015, the Court issued a sealed order setting forth several directives that limit the TCA’s activities in accordance with the Parties’ Agreement. See Order, Dec. 10, 2015, ECF No. 288. One of the directives provides that the TCA may not communicate with the press and media about the Puerto Rico Police Department or its reform process without the Court’s prior approval. Id. at 6-7. In its order, the Court asked the Parties to file any requests for additional directives they deemed necessary by February 1, 2016.

In November 2015, the TCA had informed the Parties that a television program had asked him for an interview. Since then, the Parties have sought to ascertain the interview’s subject matter, and whether it implicates the TCA’s role in the reform of the Puerto Rico Police Department. As instructed by the Court, the Parties met with the TCA’s constitutional lawyers to discuss this last week. At that time, the constitutional lawyers indicated that they needed to conduct additional fact finding to learn of the contents of the interview and when it took place.

The interview was televised yesterday, January 31, 2016, before the Parties or the TCA's constitutional lawyers were informed of its contents.

Because the Parties (1) have not yet received information from the TCA's constitutional lawyers about the contents and timing of the interview, and (2) have not had the opportunity to review the television program and assess what additional directives, if any, would be appropriate, we respectfully request an extension of time until February 5, 2016 to submit any motion for additional directives.

Respectfully submitted,

FOR PLAINTIFF UNITED STATES:

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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Joint Request for Extension to Request Further Court Directives was filed electronically on this 1st day of February 2016, with the Clerk of Court using the CM/ECF System, which will provide notice of such filing to all registered parties.

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